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IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF ALABAMA

2019 JAN -4 A 10:21

*Brandon Adams #227841*  
Full name and prison name of Plaintiff(s)  
Plaintiff(s)

v.

*SGT. CLEMONS*  
*OFFICER BROOKS*  
*OFFICER REDD*  
*OFFICER STREETER*  
*A.D.O.C - ETC. AL.*

Name of person(s) who violated your constitutional rights. (List the names of all the person.)

CIVIL ACTION NO. *2:19-cv-15-WHA-CSC*  
(To be supplied by Clerk of U.S. District Court)

I. PREVIOUS LAWSUITS

A. Have you begun other lawsuits in state or federal court dealing with the same or similar facts involved in this action? YES  No

B. Have you begun other lawsuits in state or federal court relating to your imprisonment? YES  NO

C. If your answer to A or B is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff(s) *N/A*

Defendant(s) *N/A*

2. Court (if federal court, name the district; if state court, name the county)

*N/A*

3. Docket number \_\_\_\_\_
4. Name of judge to whom case was assigned \_\_\_\_\_
5. Disposition (for example: was the case dismissed? Was it appealed? Is it still pending?) \_\_\_\_\_
6. Approximate date of filing lawsuit \_\_\_\_\_
7. Approximate date of disposition \_\_\_\_\_

## II. PLACE OF PRESENT CONFINEMENT \_\_\_\_\_

W.E. DONALDSON CORRECTIONAL FACILITYPLACE OR INSTITUTION WHERE INCIDENT OCCURRED Bullock C.F.IN RESTRICTED HOUSING

## III. NAME AND ADDRESS OF INDIVIDUAL(S) YOU ALLEGE VIOLATED YOUR CONSTITUTIONAL RIGHTS.

	NAME	ADDRESS
1.	<u>SGT. CLEMONS, F</u>	<u>Bullock C.F.</u>
2.	<u>OFFICER BROOKS, T</u>	<u>Bullock C.F.</u>
3.	<u>OFFICER REED, B</u>	<u>Bullock C.F.</u>
4.	<u>OFFICER STREETER</u>	<u>Bullock C.F.</u>
5.	<u>A.D.O.C - ETC. AL</u>	
6.		

IV. THE DATE UPON WHICH SAID VIOLATION OCCURRED 11-18-18

## V. STATE BRIEFLY THE GROUNDS ON WHICH YOU BASE YOUR ALLEGATION THAT YOUR CONSTITUTIONAL RIGHTS ARE BEING VIOLATED:

GROUND ONE: IT IS ALSO VERY IMPORTANT THAT YOU SHOW THE "STATE OF MIND" OF PRISON OFFICIALS IN EXCESSIVE FORCE CASES.

COURT HAVE FOUND A VIOLATION OF THE 8<sup>TH</sup> AMENDMENT WHERE PRISON OFFICIALS WERE RESPONSIBLE FOR "THE UNNECESSARY AND ~~WANTON~~ WANTON INFILCTION OF PAIN." "WANTON" MEANS HATEFUL, CRUEL OR UNCALLED FOR. THE FORCE USED WAS NOT A NECESSARY PART OF PRISON ~~DISCIPLINE~~ DISCIPLINE. FOR EXAMPLE, ONE COURT FOUND AN 8<sup>TH</sup> AMENDMENT VIOLATED WHEN AN OFFICER REPEATEDLY HIT A PRISONER EVEN THOUGH THE PRISONER HAD IMMEDIATELY OBEYED ~~AN~~ ANOTHER TO LIE FACE DOWN ON THE FLOOR, AND WAS ALREADY BEING

STATE BRIEFLY THE FACTS WHICH SUPPORT THIS GROUND. (State as best you can the time, place and manner and person involved.)

RESTRIINED BY FOUR OTHER OFFICERS. ESTATE OF DAVIS BY OSTENFELD V. DELO, 115 F.3d 1388 (8TH CIR. 1997). IN ANOTHER SUCCESSFUL CASE, THE PRISONER WAS HANDCUFFED AND HIT SEVERAL TIMES IN THE HEAD AND SHOULDERS WHILE IN A KNEELING POSITION. BROWN V. LIPPARD, 472 F.2d 384 (5TH CIR. 2006).

GROUND TWO: ON 11/8/18 I WAS ASSAULTED BY SGT. CLEMONS, F AND OFFICER REDD, B I HAD BEEN ASKING SEG. SUPERVISOR SGT. CLEMONS, F TO USE THE PHONE BECAUSE I HAD FAMILY, ALL WEEK SUPPORTING FACTS: AND HE HAD BEEN LYING TO ME. SO I FLOODED MY CELL THEY TURN MY WATER OFF IN MY CELL SGT. CLEMONS, F AND OFFICER REDD, B CAME TO MY CELL TO THE OFFICER TO ROLL MY CELL DOOR WITHOUT ME BEING PLACE IN HANDCUFFS. WHICH IS NOT RESTRICTED HOUSING OR SEG. UNIT PROCEDURES OR RULES & REGULATIONS, ALL INMATES MUST BE HANDCUFFED & BEFORE HIS

GROUND THREE: CELL IS OPEN. ONCE BOTH OF THEM CAME INSIDE THEY ORDERED ME TO BE SEATED ON MY BED AND I DID AS I WAS TOLD, SG OFFICER REDD, B STRUCK ME IN THE FACE AND SUPPORTING FACTS: SGT. CLEMONS, F RAMMED ME IN MY RIBS AND SHOULDER, OFFICER REDD, B STRUCK ME SEVERAL MORE TIMES IN THE FACE (LEFT SIDE). THEN SGT. CLEMONS, F PUT HIS BATON UP AND STRUCK ME SEVERAL TIMES IN THE FACE ALSO (LEFT SIDE) AS THEY WERE LEAVING I ASKED SGT. CLEMSON, F TO TAKE ME TO MEDICAL TO GET A BODY CHART, HE STATED TO ME I WILL TAKE YOU ON MY TIME. I THEN ASKED OFFICER BROOKS, T & OFFICER STREETER

TO TAKE ME TO MEDICAL FOR A BODY CHART THEY DENIED ANY ME MEDICAL TREATMENT, I THEN ASKED OFFICER BENTON TO TAKE ME TO MEDICAL FOR A BODY CHART, AND OFFICER BENTON TOLD ME SGT. CLEMONS, F GAVE HIM A ORDER NOT TO BRING ME OUT MY CELL AND TAKE ME TO MEDICAL.

VI. STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU. MAKE NO LEGAL ARGUMENT. CITE NO CASES OR STATUTES.

I LIKE FOR THE COURT TO GRANT ME THE SUM OF  
\$5 MILLION FOR VIOLATION OF MY RIGHTS AND THE  
USE OF EXCESSIVE AND UNNECESSARY FORCE ON MY  
LIFE.

Brandon Adams #227841  
Signature of plaintiff(s)

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 1/1/19  
(Date)

Brandon Adams #227841  
Signature of plaintiff(s)

R. J. All WB

January 1, 2019

MY COMMISSION EXPIRES DECEMBER 8, 2020

Brandon Horns  
R#227841 W-40  
W.E. Donaldson Corr. Fac.  
100 Warrior Lane  
Bessemer, AL 35023

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MIDDLE DISTRICT OF ALABAMA  
ONE CHURCH STREET, SUITE B-110

MONTGOMERY, AL 36104-4018

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